

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JUANA SIERRA,

Plaintiff,

-against-

THE CITY OF NEW YORK; NEW YORK CITY  
DEPARTMENT OF BUILDINGS; PATRICIA J.  
LANCASTER, in her capacity as COMMISSIONER OF  
THE NEW YORK CITY DEPARTMENT OF  
BUILDINGS; NEW YORK CITY DEPARTMENT OF  
HOUSING PRESERVATION AND DEVELOPMENT;  
SHAUN DONOVAN, in his capacity as  
COMMISSIONER OF NEW YORK CITY  
DEPARTMENT OF HOUSING PRESERVATION AND  
DEVELOPMENT; and EMAD IBRAHEM,

**NOTICE OF MOTION TO  
DISMISS THE COMPLAINT**

No. 07 CV 6769 (JSR)

Defendants.

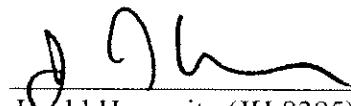
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**PLEASE TAKE NOTICE** that defendants the City of New York ("the City"), the New York City Department of Buildings ("DOB"), Patricia J. Lancaster, in her capacity as Commissioner of DOB, the New York City Department of Housing Preservation and Development ("HPD"), and Shaun Donovan, in his capacity as Commissioner of HPD, by its undersigned counsel, will move this Court before the Honorable Jed S. Rakoff, at the United States Courthouse located at 500 Pearl Street, New York, New York, on a date and at a time to be designated by the Court, for an order pursuant to Federal Rules of Civil Procedure, Rule 12(b), for the dismissal of all claims in the complaint.

Dated: New York, New York  
December 6, 2007

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City of New York  
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By:

  
\_\_\_\_\_  
Gerald Horowitz (JH 8395)  
Assistant Corporation Counsel

To: URBAN JUSTICE CENTER  
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Attorneys for Defendant Emad Ibrahim

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**NOTICE OF MOTION**

***MICHAEL A. CARDozo***

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NYCLIS No. 2007-023070*